The Honorable James L. Robart 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 CLAIRE DOUGLAS and MARY JOAN No. 2:20-cv-00193-JLR 1 1 ISABELL, individually, on behalf of similarly situated individuals, STIPULATION AND [PROPOSED] 12 ORDER EXTENDING DEADLINE Plaintiffs, 13 FOR RENEWED MOTION FOR CLASS CERTIFICATION v. 14 Noted for Consideration: BANK OF AMERICA, N.A., a national 15 April 22, 2021 banking association, 16 Defendant. 17 18 I. BACKGROUND In an Order filed on November 19, 2020, the Court, *inter alia*, (1) granted Plaintiffs' 19 motion to amend their complaint, (2) denied without prejudice Plaintiffs' motion for 20 21 class certification and (3) set new deadlines for specified class-related actions. See Dkt. No. 100. Pursuant to that Order a renewed motion for class certification was to be filed 22 by February 22, 2021. 23 After Plaintiffs filed their amended complaint on December 3, 2020, Dkt. No. 101, 24 the parties entered serious settlement discussions. To facilitate those discussions, the 25 26 parties jointly stipulated to the extension of that deadline to April 22, 2021, which the

STIPULATION AND ORDER EXTENDING

DEADLINE - 1

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1	Court approved in an Order entered on January 11, 2021. Dkt. No. 104. Since then,
2	settlement discussions have continued fruitfully, with the parties' counsel approaching
3	agreement on proposed settlement terms. Accordingly, the parties have agreed to jointly
4	request a two-week extension of the pending class certification motion deadline to
5	facilitate that process.
6	II. STIPULATION
7	The parties agree that, subject to Court approval, the deadline for Plaintiffs to
8	renew their motion for class certification set forth in Dkt. No. 104 should be extended to
9	May 6, 2021.
10	DATED: April 22, 2021.
11	SIRIANNI YOUTZ PAINE HAMBLEN SPOONEMORE HAMBURGER PLLC
13 14 15 16 17 18 19	/s/ Daniel S. Gross Richard E. Spoonemore, WSBA #21833 Chris R. Youtz, WSBA #7786 Daniel S. Gross, WSBA #23992 Daniel S. Gross, WSBA #23992 3101 Western Avenue, Suite 350 Seattle, WA 98121 Tel.: (206) 223-0303 Email: rick@sylaw.com Email: chris@sylaw.com Email: chris@sylaw.com Email: daniel@sylaw.com Attorneys for Plaintiffs /s/ Garrett J. Williams Kelly D. Folger, WSBA #39407 Garrett J. Williams Kelly D. Folger, WSBA #39407 Garrett J. Williams Kelly D. Folger, WSBA #39407 Garrett J. Williams **Attorneys for pague Avenue, Suite 1200 Spokane, WA 99201 Telephone: (509) 455-6000 Email: kdf@painehamblen.com Email: gjw@painehamblen.com **BANK OF AMERICA, N.A.* Attorneys for Plaintiffs ATTORNEY WEST SEATTLE
21 22 23 24 25 26	
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1 III. ORDER 2 Based on the stipulation of the parties and for good cause shown, the deadline for 3 Plaintiffs to file a renewed motion for class certification shall be extended from April 22, 4 2021 to May 6, 2021. 5 DATED this 26th day of April 2021. 6 7 James L. Robart 8 United States District Judge 9 Presented by: 10 SIRIANNI YOUTZ PAINE HAMBLEN 1 1 SPOONEMORE HAMBURGER PLLC 12 /s/ Daniel S. Gross /s/ Garrett J. Williams 13 Richard E. Spoonemore, WSBA #21833 Kelly D. Folger, WSBA #39407 Garrett J. Williams, WSBA #52902 Chris R. Youtz, WSBA #7786 14 Daniel S. Gross, WSBA #23992 717 W. Sprague Avenue, Suite 1200 Spokane, WA 99201 15 3101 Western Avenue, Suite 350 Seattle, WA 98121 Telephone: (509) 455-6000 16 Tel.: (206) 223-0303 Email: kdf@painehamblen.com Email: rick@sylaw.com Email: gjw@painehamblen.com 17 Email: chris@sylaw.com Attorneys for Defendant 18 Email: daniel@sylaw.com BANK OF AMÉRICA, N.A. Attorneys for Plaintiffs 19 ATTORNEY WEST SEATTLE 20 21 /s/ Eric J. Harrison Eric J. Harrison, WSBA #46129 22 5400 California Avenue SW Seattle, WA 98136 23 Tel. (206) 388-8092 24 Email: eric@attorneywestseattle.com Attorneys for Plaintiffs 25 26

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DEADLINE - 3